

# Exhibit I

## **Julia Longoria**

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**From:** Gore, John M. <jmgore@jonesday.com>  
**Sent:** Wednesday, January 4, 2023 9:04 PM  
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**Subject:** RE: LUPE v. Abbott 5:21-cv-844 | Consolidated Plaintiffs' Amended First RFPs to Defendant Intervenors

Nina:

Thanks for sending these.

We are available for a meet-and-confer on Thursday after 3 ET, Friday after 2 ET, and Monday morning.

We'd also like to discuss the schedule and scope of the depositions.

Thanks,

John

John M. Gore

Partner

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**From:** Nina Perales <[nperales@MALDEF.org](mailto:nperales@MALDEF.org)>

**Date:** Wednesday, Jan 04, 2023, 7:07 PM

**To:** Gore, John M. <[jmgore@jonesday.com](mailto:jmgore@jonesday.com)>, Tony Nelson <[Tony.Nelson@traviscountytexas.gov](mailto:Tony.Nelson@traviscountytexas.gov)>, tiffany.bingham@harriscountytexas.gov <[tiffany.bingham@harriscountytexas.gov](mailto:tiffany.bingham@harriscountytexas.gov)>, megan.cloud@weil.com <[megan.cloud@weil.com](mailto:megan.cloud@weil.com)>, daniel.freeman@usdoj.gov <[daniel.freeman@usdoj.gov](mailto:daniel.freeman@usdoj.gov)>, michael.stewart3@usdoj.gov <[michael.stewart3@usdoj.gov](mailto:michael.stewart3@usdoj.gov)>, jennifer.yun@usdoj.gov <[jennifer.yun@usdoj.gov](mailto:jennifer.yun@usdoj.gov)>, dana.paikowsky@usdoj.gov <[dana.paikowsky@usdoj.gov](mailto:dana.paikowsky@usdoj.gov)>, tiffani.soo-tim@usdoj.gov <[tiffani.soo-tim@usdoj.gov](mailto:tiffani.soo-tim@usdoj.gov)>, richard.dellheim@usdoj.gov <[richard.dellheim@usdoj.gov](mailto:richard.dellheim@usdoj.gov)>, lauren.putnam@usdoj.gov <[lauren.putnam@usdoj.gov](mailto:lauren.putnam@usdoj.gov)>, 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**Subject:** RE: LUPE v. Abbott 5:21-cv-844 | Consolidated Plaintiffs' Amended First RFPs to Defendant Intervenors

\*\* External mail \*\*

Dear John,

Please find attached Consolidated Plaintiffs' Amended First RFPs to Defendant Intervenors. As a convenience to you, I have also attached a redline showing changes from the original First RFPs served on Defendant Intervenors on July 7, 2022.

I also write to ask your availability for a meet and confer to discuss the attached requests, your December 1, 2022 document production and the pending deposition notices and subpoenas. Please let me know when you are able to meet, thank you.

Nina Perales  
Vice President of Litigation  
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